



January 15, 2021

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**By ECF**

The Honorable Jed S. Rakoff  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

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Re: United States v. Abell Oujaddou, 18-cr-00579 (JSR)

Dear Judge Rakoff:

We represent Abell Oujaddou in the above-captioned matter. We respectfully write to request early termination of Mr. Oujaddou's supervised release, which is currently scheduled to end on or about October 10, 2021.

As you may recall, on November 1, 2018, Mr. Oujaddou entered a guilty plea before the Your Honor to one count of Conspiracy to Commit Securities Fraud in violation of Title 18 U.S.C. Section 371 and one count of Securities Fraud in violation of Title 15 U.S.C. Sections 78j(b) and 78ff. On October 11, 2019, this Court sentenced Mr. Oujaddou to Time Served followed by two years of Supervised Release. Mr. Oujaddou has been on supervised release since the date of his sentencing.

The statute governing early termination of supervised release, 18 U.S.C. § 3583(e), provides that the court may terminate a term of supervised release "and discharge the defendant released at any time after the expiration of one year of supervised release ... if it is satisfied that such action is warranted by the conduct of the defendant and the interest of justice." Mr. Oujaddou, who has been on supervised release for approximately fifteen months, respectfully submits that he meets the criteria for early termination of supervised release.

We have spoken with Mr. Oujaddou's Probation Officer, Zondra Jackson, and she concurs. Officer Jackson has informed us that Mr. Oujaddou has been in full compliance with the conditions of his supervised release and has complied with all of her requests. As a result, Officer Jackson consents to Mr. Oujaddou's early termination.<sup>1</sup> In addition, Mr. Oujaddou

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<sup>1</sup> We have also spoken with AUSA Christine Magdo, and she takes no position with Mr. Oujaddou's request.



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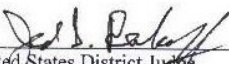
timely paid his \$500,000 fine and his \$200 Special Assessment. His forfeiture obligation was satisfied at the time of sentencing.

The reason Mr. Oujaddou seeks to have his period of supervised release terminated early is related to quality of life for his family. Mr. Oujaddou and his family would like to spend more time Florida to attend to the business they have established in Miami and to pursue a business opportunity in Tampa. He believes that remaining on supervised release will hamper his ability to remain in Florida for extended periods, if need be. He would also like the ability to travel to states outside of New York (and Florida) when travel is feasible.

Accordingly, we respectfully request the Court to grant Mr. Oujaddou's request for early termination of supervised release. Should the Court require additional information, I am available at Your Honor's convenience.

SO ORDERED.

February 1, 2021

  
United States District Judge

Respectfully submitted,



E. Scott Morvillo

cc: Probation Officer Zondra M. Jackson  
AUSA Christine Magdo